

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JENNIFER SHAH,

Defendant.

No. S4 1:19-cr-0833 (SHS)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendant Jennifer Shah's Omnibus Pre-Trial Motions, the accompanying Declarations of Daniel R. Alonso and Jennifer Shah, including exhibits, and upon all the pleadings filed in this action, Defendant Jennifer Shah, by her counsel Buckley LLP, will move this Court before the Honorable Sidney H. Stein, United States District Judge, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, at a date and time to be determined by the Court, for an Order (a) dismissing the superseding indictment for legal and factual insufficiency; (b) granting a bill of particulars; (c) suppressing evidence seized pursuant to two defective search warrants, or alternatively for an evidentiary hearing pursuant to *Franks v. Delaware*, 438 U.S. 154 (1978); (d) granting review of the grand jury minutes; (e) compelling discovery of *Brady* and *Giglio* material, as well as the post-arrest statements of co-defendant Stuart Smith; (f) suppressing Ms. Shah's post-arrest interrogation statements in their entirety; and (g) granting leave to file additional and supplemental motions and to join co-defendants' motions, as appropriate.

PLEASE TAKE FURTHER NOTICE that, pursuant to a prior Order of the Court, the

Government's answering papers, if any, must be filed on or before July 1, 2021, while Ms. Shah's reply would be due within seven days of service pursuant to Local Criminal Rule 49.1(c).

Dated: June 14, 2021
New York, New York

Respectfully submitted,

BUCKLEY LLP

/s/ Daniel R. Alonso

Daniel R. Alonso

Michael Chu

1133 Avenue of the Americas, Suite 3100

New York, New York 10036

Tel: (212) 600-2400

dalonso@buckleyfirm.com

mchu@buckleyfirm.com

Henry Asbill

2001 M Street NW, Suite 500

Washington, DC 20036

Tel: (202) 349-8000

hasbill@buckleyfirm.com

Attorneys for Defendant Jennifer Shah